

(Del. Rev. 12/59)
ORIGINAL**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NINA SHAHIN, CPA

(Name of Plaintiff or Plaintiffs)

v.

CIVIL ACTION No. 06 - 289

STATE OF DELAWARE

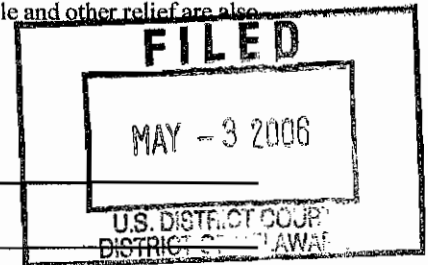
DEPARTMENT OF FINANCE

(Name of Defendant or Defendants)

COMPLAINT UNDER TITLE VII**OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to *Title VII of the Civil Rights Act of 1964*, as amended, for **employment discrimination**. Jurisdiction exists by virtue of 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff resides at 103 SHINNECOCK ROAD
(Street Address)
 DOVER KENT DELAWARE 19904
(City) (County) (State) (Zip Code)
(302) 678-1805
(Area Code) (Phone Number)



3. Defendant resides at, or its business is located at 820 N. FRENCH STREET
(Street Address)
 WILMINGTON NEW CASTLE DE 19899
(City) (County) (State) (Zip Code)

4. The discriminatory conduct occurred in connection with plaintiff's employment or application to be employed at, defendant's department of revenue place of business
(Defendant's Name)
 located at 820 N. French Street, Wilmington, DE 19899
(Street Address)
 Wilmington New Castle DE 19899
(City) (County) (State) (Zip Code)

5. The alleged discriminatory acts occurred on 2004-2005, _____, _____, _____
(Day) (Month) (Year)
6. The alleged discriminatory practice ~~is~~ ~~XXXXXX~~ continuing.

7. Plaintiff filed charges with the Department of Labor of the State of Delaware,
Labor Law Enforcement 24 N.W. Front Street, Milford
(Agency) (Street Address) (City)
Sussex DE 19963, regarding
(County) (State) (Zip Code)
defendant's alleged discriminatory conduct on _____, _____, _____ in 2004-2005
(Day) (Month) (Year)
8. Plaintiff filed charges with the Equal Employment opportunity Commission of the United States
regarding defendant's alleged discriminatory conduct on: 13, 12, 2004.
(Day) (Month) (Year)
9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue letter
which was received by plaintiff on: 20, 02, 2006.
(Day) (Month) (Year)

(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)

10. The alleged discriminatory acts, in this suit, concern:

- A. ~~Failure to employ plaintiff.~~
B. ☒ Termination of plaintiff's employment.
C. ☒ Failure to promote plaintiff.
D. ☒ Other acts (please specify below)

11. Defendant's conduct is discriminatory with respect to the following:

- A. ☐ Plaintiff's race
- B. ☐ Plaintiff's color
- C. ☐ Plaintiff's sex
- D. ☐ Plaintiff's religion
- E. ☐ Plaintiff's national origin

☒ D. Age Discrimination

12. A copy of the charges filed with the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

13. If relief is not granted, plaintiffs will be irreparably denied rights secured by Title VII of the 1964 Civil Rights Act, as amended.

14. Plaintiff's has no adequate remedy at law to redress the wrongs described above.

THEREFORE, Plaintiff prays as follows: (Check appropriate letter(s))

- A. ☒ That all fees, cost or security attendant to this litigation be hereby waived.
- B. ☒ That the Court appoint legal counsel.
- C. ☒ That the Court grant such relief as may be appropriate, including injunctive orders, damages, cost and attorney's fees.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 05/01/2006


(Signature of Plaintiff)

(Signature of additional Plaintiff)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Nina Shahin**
103 Shinnecock Road
Dover, DE 19904

From: **Philadelphia District Office - 530**
21 South 5th Street
Suite 400
Philadelphia, PA 19106



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR § 1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

17C-2005-00137

Charles Brown, III,
State & Local Coordinator

(215) 440-2842**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans with Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.



Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.



While reasonable efforts were made to locate you, we were not able to do so.



You were given 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this Notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Marie M. Tomasso

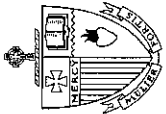
February 16, 2006

Enclosure(s)

Marie M. Tomasso,
District Director

(Date Mailed)

cc: **STATE OF DE/DEPT. OF FINANCE**
820 N. French Street
Wilmington, DE 19899



Misericordia

NSF Young Scholars Program
Explorations in Mathematics and Biology

Nina Shahin, CPA, MAS, MST
103 Shinnecock Rd.
Dover, DE 19904

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



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US FEDERAL

COURT FOR

THE STATE OF DELAWARE

J. Caleb Boggs Federal Bldg.

844 North King St.

Wilmington, DE 19801-3519(lockbox

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**RETURN RECEIPT
REQUESTED**